



Chahira Solh
csolh@crowell.com
+1.949.789.1367 direct

Crowell & Moring LLP
3 Park Plaza
20th Floor
Irvine, CA 92614
+1.949.263.8400 main
+1.949.263.8414 fax

September 11, 2023

VIA ECF

Hon. Matthew W. Brann
U.S. District Court
Middle District of Pennsylvania
U.S. Courthouse and Federal Office Building
240 West Third Street, Suite 218
Williamsport, PA 17701

Re: In re Geisinger System Services and Evangelical Community Hospital
Healthcare Workers Antitrust Litigation, Case No. 4:21-cv-00196-MWB

Dear Chief Judge Brann:

Defendants Geisinger System Services and Evangelical Community Hospital hereby file this supplemental letter to apprise the Court that plaintiffs served the enclosed letter (Exhibit A) at 6:42 PM EST on the evening of September 8, 2023—several hours *after* defendants sought the Court’s intervention to compel plaintiffs to comply with the July 21, 2023 order to produce all outstanding discovery and also to issue sanctions for plaintiffs’ continued discovery misconduct (ECF No. 135).

Defendants are reviewing the new information provided in plaintiffs’ letter in light of the serious deficiencies addressed in their September 8 filing, and reserve all rights to seek further relief based on plaintiffs’ letter.

Respectfully submitted,

/s/Chahira Solh
Chahira Solh (*Pro Hac Vice*)
CROWELL & MORING LLP
3 Park Plaza, 20th Floor
Irvine, CA 92614-8505
Phone: (949) 798-1367
csolh@crowell.com

/s/Norm Armstrong, Jr.
Norm Armstrong, Jr.
KING & SPALDING LLP
1700 Pennsylvania Avenue
Washington, DC 20006

Stephanie Resnick
Theodore H. Jobes



Stefan M. Meisner (*Pro Hac Vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue NW
Washington, DC 20004
Phone: (202) 624-2500
smeisner@crowell.com

Rosa M. Morales (*Pro Hac Vice*)
CROWELL & MORING LLP
590 Madison Avenue, 20th Floor
New York, NY 10022
Phone: (212) 895-4261
rmorales@crowell.com

Daniel T. Brier
Donna A. Walsh
Richard L. Armezzani
MYERS BRIER & KELLY LLP
425 Spruce Street, Suite 200
Scranton, PA 18503
Phone: (570) 342-6100
dbrier@mbklaw.com
dwalsh@mbklaw.com
rarmezzani@mbklaw.com

*Counsel for Defendant Geisinger
System Services*

John Fuller
FOX ROTHSCHILD LLP
2000 Market Street, 20th Floor
Philadelphia, PA 19103-3222
Telephone: (215) 299-2000
sresnick@foxrothschild.com
tjobes@foxrothschild.com
jfuller@foxrothschild.com

*Counsel for Defendant Evangelical
Community Hospital*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 11th day of September 2023, a true and correct copy of this letter was filed with the Court's Case Management/ Electronic Case Filing System and served upon all counsel known to be representing the plaintiffs.

/s/Chahira Solh
Chahira Solh